



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

December 21, 2005

Dennis A. Johnson
Senior Portfolio Manager
CalPERS Investment Office
400 Q Street
Sacramento, CA 95814

Dear Mr. Johnson:

Thank you for the November 8th letter with which you provided me with another copy of your June 3rd letter to me. In your June 3rd letter, the California Public Employees' Retirement System, along with representatives of a number of other pension funds, asked that the federal government publicly disclose the identity of companies that, by virtue of their business with or ties to terrorist sponsoring nations, are acting contrary to U.S. foreign policy and humanitarian interests. You also asked that the SEC report other information on such companies that will enhance investors' ability to make prudent investment decisions.

We appreciate your desire to ensure that public pension funds invest in a manner that is consistent with U.S. foreign policy and humanitarian goals. However, this agency does not have the expertise, information or authority to allow us to determine whether companies' contacts with terrorist sponsoring states are contrary to U.S. foreign policy and humanitarian goals. It may be that there are other government agencies that are in a position to make those judgments. Further, we do not believe it would be appropriate for us to attempt to publish the list of companies you request or to participate in publication of such a list, or to publish the additional information you request about the companies you describe. Again, we do not have the expertise or information to engage in these activities and our doing so might be construed as providing investment advice. As the agency charged with regulating public companies, we cannot give investment advice, or issue guidance regarding the decision to invest, or not invest, in certain companies. Instead, we work through the review and comment process to pursue full disclosure of material information by public companies reporting with us regarding material global security risk and other material matters. Our Office of Global Security Risk works closely with the review staff in this Division to monitor whether the documents public companies file with the SEC include disclosure of material information about contacts with countries that have been identified by the U.S. State Department as state sponsors of terrorism. Our goal is to ensure that the publicly available documents on file with this agency give all investors the material information on which to base their investment decisions.

I appreciate the opportunity to respond to your letter and hope that this information adequately addresses your concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alan L. Beller". The signature is fluid and cursive, with the first name "Alan" and last name "Beller" clearly distinguishable.

Alan L. Beller
Director